

1 AIMEE CLARK NEWBERRY, ESQ.
 Nevada Bar No. 11084
 2 **CLARK NEWBERRY LAW FIRM**
 410 S. Rampart Blvd., Suite #390
 Las Vegas, Nevada 89145
 T: (702) 608-4232
 F: (702) 946-1380
 aclarknewberry@cnlawlv.com
 Attorney for Valencia Management LLC Series 4

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 VALENCIA MANAGEMENT LLC SERIES)	CASE NO.: 2:22-cv-00345-APG-DJA
10 4, a Nevada limited liability company,)	
11 Plaintiff,)	STIPULATION AND ORDER TO
12 vs.)	EXTEND TIME TO FILE AMENDED
	COMPLAINT
13 NEWREZ LLC, F/K/A NEW PENN)	(First Request)
14 FINANCIAL, LLC, D/B/A SHELLPOINT)	
15 MORTGAGE SERVICING; NATIONAL)	
16 DEFAULT SERVICING CORPORATION,)	
DOE individuals I through XX; and ROE)	
CORPORATIONS I through XX,)	
17 Defendants.)	
_____)	

18
 19 Plaintiff VALENCIA MANAGEMENT LLC SERIES 4 (“Plaintiff”) and Defendant NEWREZ
 20 LLC, F/K/A NEW PENN FINANCIAL, LLC, D/B/A SHELLPOINT MORTGAGE SERVICING
 21 (“Defendant”), by and through their attorneys of record, hereby submit this Stipulation for an
 22 extension of time for Plaintiff to file an amended complaint pursuant to this Court’s order (ECF #51),
 23 from the current deadline of October 28, 2022 to November 14, 2022, as the parties are working
 24 toward a settlement of this case.

25
 26 This is the first request for an extension of time to file an amended complaint. This extension is
 27 sought in good faith, and is not intended to cause any delay or prejudice to any party. Good cause
 28 supports the request for extension to allow the parties additional time to attempt to resolve this case

short of the filing of the amended pleading and to allow counsel for Plaintiff additional time to confer with her client.

DATED this 27th day of October 2022

CLARK NEWBERRY LAW FIRM

/s/ Aimee Clark Newberry
 AIMEE CLARK NEWBERRY, ESQ.
 Nevada Bar No. 11084
 410 S. Rampart Blvd., Suite 390
 Las Vegas, Nevada 89145
Attorney for Valencia Management LLC Series #4

DATED this 27th day of October 2022

AKERMAN LLP

/s/ Nicholas E. Belay
 ARIEL STERN, ESQ.
 Nevada Bar No. 8276
 NATALIE L. WINSLOW, ESQ.
 Nevada Bar No. 12125
 NICHOLAS E. BELAY, ESQ.
 Nevada Bar No. 15175
 1635 Village Center Circle, Suite 200
 Las Vegas, NV 89134
Attorney for NewRez LLC, fka New Penn Financial, LLC, dba Shellpoint Mortgage Servicing

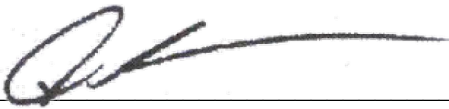
ORDER

IT IS HEREBY ORDERED that Plaintiff shall file its amended complaint on or before November 14, 2022.

Respectfully submitted by:

CLARK NEWBERRY LAW FIRM

/s/ Aimee Clark Newberry
 AIMEE CLARK NEWBERRY, ESQ.
 Nevada Bar No. 11084
 410 S. Rampart Blvd., #390
 Las Vegas, NV 89145
 (702) 608-4232
Attorney for Valencia Management LLC Series #4


 UNITED STATES DISTRICT COURT
 DATED: October 28, 2022